

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ELIZABETH TON, a/k/a LISA GOMES

INFORMATION

Case No. 3:17-cr-206-04

Violation: 18 U.S.C. § 1956(h)

**Money Laundering Conspiracy to Conceal the Nature, Location, and Ownership of
Proceeds of Specified Unlawful Activity**

The United States Attorney Charges:

From in or about January 2013 to in or about August 2016, in the Districts of North Dakota, Oregon, Florida, Georgia, North Carolina, New Jersey, California, South Carolina, Ohio, Colorado, Maryland, and elsewhere,

ELIZABETH TON, a/k/a LISA GOMES,

did knowingly and willfully combine, conspire, confederate, and agree together and with others, to commit an offense against the United States, specifically: to violate Title 18, United States Code, Sections 1956(a)(1)(B)(i) and (a)(2)(B)(i), in that members of the conspiracy did knowingly and intentionally conduct and attempt to conduct financial transactions in and affecting interstate and foreign commerce within the United States by moving monetary instruments from the United States to Canada and China as described below, which involved the proceeds of a specified unlawful activity, that is, the distribution and importation of controlled substances and controlled substance analogues intended for human consumption in violation of Title 21, United States Code, Sections 802(32), 812, 813, 841, 846, 848, 952, 960 and 963, knowing that the transactions were

designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(h).

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. During the course of and to further said conspiracy, members of the conspiracy sold controlled substances and controlled substance analogues across the United States including, but not limited to: North Dakota, Oregon, Florida, Georgia, North Carolina, New Jersey, California, South Carolina, Ohio, Colorado, Maryland, and elsewhere;
2. During the time frame of the conspiracy, members of the conspiracy sold the controlled substances and controlled substance analogues. Co-conspirators then conducted numerous financial transactions including, but not limited to, money wires, bank wires, and bank deposits, using U.S. currency, Canadian currency, and virtual currency systems to pay for controlled substances; and
3. To hide their financial transactions, co-conspirators used off-shore accounts, anonymous virtual currency transactions, and third parties to move money, as well as using encrypted communication applications to discuss financial transactions; and

4. The purpose of transferring currency in this fashion was to conceal and disguise the nature, source, ownership, and control of the proceeds from the trafficking of controlled substances and controlled substance analogues;

In violation of Title 18, United States Code, Section 1956(h).

A handwritten signature in black ink, appearing to read "C.C. Myers", is positioned above a horizontal line.

CHRISTOPHER C. MYERS
United States Attorney

CCM:ld